

The clerk of the Court requested that the government submit an updated witness list, in light of the Court's ruling granting defendant Partida's motion for severance. The government accordingly submits the following amended witness list. The government expects to call each of the below witnesses in its case-in-chief.

Witness Name	Summary of Expected Testimony	Duration of Direct
Fierro, Milton	Fierro committed the 8/11/11 armed robbery with defendant Dominguez and will testify about the preparation for and execution of the robbery, including the weapons used and the statements made by Dominguez regarding his cousin who worked at Garda and helped plan the 8/11/11 robbery.	1:30
Butler, Caitlin	Butler is Dominguez's girlfriend and will testify that she was home on the night of the 8/11/11 robbery and recalls Dominguez coming home carrying large black duffel bags and asking her to stay upstairs. Butler will also testify about the approximately \$85,000 in cash that Dominguez gave to her during the 8-10 months following the robbery and about the cash deposits she made into her bank account with that money. Butler will also testify that she and Dominguez drove to Oregon in the early morning of 8/12/11 and that she caught Dominguez searching on her computer for internet articles about the Garda warehouse robbery during their trip to Oregon.	1:00

1 2 3 4 5 6 7 8 9 10	Dominguez, David	David Dominguez is Dominguez's younger brother and cousin to Partida. David Dominguez will testify that he drove the car heading towards the Garda warehouse during the 8/6/12 attempted robbery and that co-conspirator Juan Dominguez, Jr. was in his car and called off the robbery when Dominguez Jr. suspected that they were being followed. David Dominguez will also testify that Partida and Dominguez grew up hanging out with one another as cousins in Santa Rosa. David Dominguez will also testify about Dominguez's text messages and statements to him in the days leading up to the 8/6/12 robbery attempt.	:30
11 12 13 14 15 16 17 18 19 20 21	Jensen, Kevin	Jensen and Dominguez are old friends and Jensen will testify about how Dominguez contacted him in July 2012 and requested that he assist in a robbery of the Garda warehouse. Instead of going through with the robbery, Jensen called the FBI (in order to obtain reward money) and acted as a government informant during Dominguez's planning of the 8/6/12 armed robbery. Jensen will testify about those planning meetings and about the steps that were taken on 8/6/12 in order to facilitate the robbery. Jensen's audio-recorded conversations with Dominguez will all come in through Jensen.	1:30

Geernaert, Shawn	Geernaert and Dominguez are old friends and Geernaert will testify about the money that Dominguez offered Geernaert to rent Geernaert's cabinet shop on the night of the 8/6/12 robbery (other witnesses will testify that Dominguez planned to bring the stolen armored car back to Geernaert's cabinet shop). Geernaert will also testify that when he spoke to Dominguez on 8/7/12, Dominguez told him that "it didn't work out" because "there was cops."	:45
Trichel, Chance	Trichel is a jailhouse informant who was in custody at the Sonoma County Jail with Dominguez and will testify about how Dominguez – who believed that Trichel was scheduled to be released shortly – approached Trichel, told Trichel that he committed the Garda robbery, and asked Trichel to track down Dominguez's friend, obtain money from that friend, and take that money to Jensen, the government's cooperating witness, in an effort to bribe Jensen not to testify against Dominguez at trial.	:30
Blake, James	Blake will testify that Dominguez drove down to Southern California and purchased a 2011 Harley Davidson motorcycle from him on 8/30/11 for \$21,000 in cash. This testimony forms the basis of Count Four.	:15
Ramirez, Erica	Ramirez is a bank teller who will testify that she recalls Dominguez personally coming into the branch where she worked (during late 2011 and early 2012) to make cash deposits on a fairly regular basis.	:15

Lambert, Linda Jean	Lambert lived directly across from the Garda warehouse on 8/11/11 and will testify about what she observed on the night of the robbery.	:20
Payne, Deanna	Payne owns Scott Machinery and will testify that Dominguez purchased a Edwards 60-ton Hydraulic Ironworker from her with a \$10,775 wire transfer on 3/7/12. This testimony forms the basis of Count Six.	:15
Trompeter, Robert	Trompeter is the manager at Manly Hyundai Santa Rosa and will testify that Dominguez purchased a 2010 Hyundai Genesis from his dealership on 12/4/11 with a \$20,000 cashier's check. This testimony forms the basis of Count Five.	:15
Holliday, Jason	Holliday will testify that he was fishing the Russian River on January 25, 2013 when he found a Smith and Wesson .357 handgun , wrapped in an Under Armor ski mask. The Santa Rosa Police Department analyzed the serial number on the gun and determined that it was the gun that was taken from the armed guard during the 8/11/11 Garda robbery.	:15
Reynolds, Bryan, Detective, SRPD	Det. Reynolds conducted a portion of the surveillance on 8/6/12 and his observations corroborate the testimony of the cooperating witnesses.	:30
Boettger, Brian, Detective, SRPD	Det. Boettger had primary responsibility for investigating the 8/6/12 attempted robbery. Det. Boettger will testify, among other things, about his oversight and management of the confidential informant, his interview with Partida, and his analysis of the cellular phones in the case.	1:00

Corcoran, Ryan, Sergeant, SRPD	Sgt. Corcoran had primary responsibility for investigating the 8/11/11 robbery. He will testify, among other things, about the crime scene analysis, the physical evidence recovered from Garda warehouse, and his early investigation.	1:00
Menke, Travis, Detective, SRPD	Det. Menke will testify that he personally performed the forensic cellular phone analysis on Dominguez's cellular phone and he will introduce the results of that analysis.	:20
Peirsol, Tom, Retired Detective, SRPD	Det. Peirsol had primary responsibility for installing and monitoring the GPS tracking devices used on the vehicles involved in the 8/6/12 attempted robbery. He will introduce the relevant GPS tracking results.	:30
Azzouni, Mark Detective, SRPD	Det. Azzouni conducted a portion of the surveillance on 8/6/12 and his observations corroborate the testimony of the cooperating witnesses.	:20
McElhaney, Eric, Officer, SRPD	Officer McElhaney was the first responder to the crime scene on 8/11/11.	:20
Riley, Andrew, Detective, SRPD	Det. Riley was the team leader during the execution of the search warrant at Dominguez's primary residence and he will testify about each of the relevant items recovered during that search.	1:00
Cude, Jesse, Officer, SRPD	Officer Cude was the team leader during the execution of the search warrant at Dominguez's primary residence and he will testify about each of the relevant items recovered during that search.	:30

Navarro, Ray, Sergeant, SRPD	Sgt. Navarro was responsible for creating the diversion that talked Dominguez out of going forward with the robbery on 8/6/12 and he will testify about that diversion effort.	:20
Andrews, Vaughn, Detective, SRPD.	Det. Andrews was responsible for investigating Dominguez's bank accounts, assets, expenditures, and cash deposits between 8/11/11 and 8/6/12. Det. Andrews will testify about the results of his analysis.	:45
Vanek, Melissa, SA, FBI (Case Agent)	Special Agent Vanek is the government's designated case agent pursuant to Fed. R. Evid. 615(b), and may testify regarding steps she undertook in the investigation of the case, including interviews of Partida and Dominguez, cellular phone analysis, and bank record analysis. All of the government's summary exhibits were prepared by and will be introduced through Special Agent Vanek.	1:30
Cesar Contreras, Garda	Contreras was one of the two armed guard who was held up at gunpoint and zip-tied during the 8/11/11 robbery. He will testify about the details of the robbery.	1:00
Aun Yath, Garda	Yath was one of the two armed guard who was held up at gunpoint and zip-tied during the 8/11/11 robbery. He will testify about the details of the robbery.	1:00

Osborne, Bob, Reg. Security Mgr., Garda	Osborne was the Garda manager responsible for the investigation into the 8/6/12 attempted robbery and he will testify about the affect on interstate commerce that the 8/6/12 robbery would have had, the amount of money being transported on the target armored car on 8/6/12, and the reward that Garda offered for any information relating to the 8/11/11 robbery.	:30
Montgomery, Ralph, Accountant, FBI	Forensic Accountant Montgomery is expected to testify about the process he employed to analyze and summarize the relevant bank records in this case. He will describe Dominguez's various bank accounts and will also summarize and compare the account activity in each of those accounts prior to August 11, 2011 with the account activity subsequent to August 11, 2011. Montgomery will compare the volume of cash deposits into Dominguez's bank accounts prior to August 11, 2011 with the volume of cash deposits subsequent to August 11, 2011. Montgomery will also compare major expenditures from Dominguez's bank accounts prior to August 11, 2011 with major expenditures from those same accounts subsequent to August 11, 2011. Finally, Montgomery will testify about his analysis of Caitlin Butler's bank account and will summarize the cash deposits into that account subsequent to August 11, 2011.	1:00

<p>Cosenza, Wendell, CAST, FBI</p>	<p>In summary, Agent Cosenza will explain: (1) how cellular telephones and cellular telephone networks operate; (2) that cellular providers use cell towers that communicate with cellular phones within a certain range; (3) the information contained in cellular telephone records, also known as “call detail records” or “CDRs;” and (3) that it is possible to approximate to a fair degree of accuracy the location of a cellular telephone based on information contained in CDRs, notably, based on the cell site location accessed for a particular call, along with any attendant sector information. Agent Cosenza will also testify that he conducted cell site location analysis for: the Verizon cellular telephone assigned call number (707) 888-0664 for the date of August 6, 2012; the Metro PCS cellular telephone assigned call number (707) 393-1967 for the dates of August 6 and 7, 2012; and the AT&T cellular telephone assigned call number (707) 486-6600 for the date of August 11, 2011. Agent Cosenza is expected to offer an opinion that the general locations of the cellular telephones assigned numbers (707) 888-0664, (707) 393-1967 and (707) 486-6600 on the dates referred to above.</p>	<p>1:00</p>
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1 DATED: January 27, 2014

Respectfully submitted,

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3 MELINDA HAAG
United States Attorney

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5 /s/
RANDY LUSKEY
6 Assistant United States Attorney